NEGLIGENCE—LIABILITY OF RAILWAYS FOR INJURIES CAUSED BY TRAINS PROJECTING OVER THE PLATFORM.—In the recent case of *Norfolk & Western Railway Co.* v. *Hawkes*, 9 Va. Law Reg. 1060, it was held that a railroad employee of intelligence, whose duty it was to attend passenger trains and receive the mail pouch, and who, seeing the train approaching, stands near the edge of the platform, which is twelve feet wide, could not recover for an injury inflicted upon him by reason of being struck by the train which projected tortuously from one to ten inches over said platform; because his contributory negligence in standing so close barred his recovery; and the court quotes several cases holding that passengers under such circumstances cannot recover. *Chicago, B. & Q. R. R.* v. *Mahara*, 47 Ill. App. 208; *Matthews* v. *Penn. Ry. Co.*, 148 Pa. 491, 24 Atl. 67; *Dotson* v. *Erie R. Co.* (N. J. Err. & App.), 54 Atl. 827. A different rule is laid down in regard to passengers in the recent case of *Lehigh Valley R. R. Co.* v. *Dupont*, 128 Fed. Rep. 840, where the United States Circuit Court of Appeals for the second circuit held that a passenger has a right to assume that the platform is so related to the track that the train will not sweep over any part of it. To the same effect, *Dobiecki* v. *Sharp*, 88 N. Y. 203; *Archer* v. *R. R.*, 106 N. Y. 589, 13 N. E. 318.

MUNICIPAL LAW—LIABILITY OF CITY FOR DERELICTION OF OFFICERS IN LICENSING UNSAFE THEATRE—PUBLIC NUISANCE—IROQUOIS THEATRE FIRE.—The opinion of the Superior Court of Cook county by Holdom, J., sustained the demurrer to plaintiff's declaration on the ground that no action could be maintained against the city of Chicago under the averments of the declaration either upon the ground that the Iroquois Theatre, the scene of plaintiff's injuries, was a public nuisance, or that the city was liable for such injuries because of the dereliction of its officers in licensing the theatre before it had complied with the ordinances of the city in relation to its construction, or installing of fire apparatus, or the furnishing of egress in sufficient numbers for safe exit of its patrons in the case of fire.—*Chicago Legal News, July* 9, 1904.

CONSTITUTIONAL LAW—PORTO RICANS ARE NOT ALIENS—QUAERE: ARE THEY CITIZENS?—Logic and law often part company, although law bids her sister adieu with a sad smile that seems to express the hope that they may meet again some day. In the case of *Gonzales* v. *Williams*, 24 Sup. Court Reporter 177, the Supreme Court of the United States makes an additional ruling upon the status of the inhabitants of Porto Rico, in which it holds that a native of Porto Rico who was an inhabitant of that island at the time of its cession to the United States is not an alien immigrant within the meaning of the immigration act of 1891. The Chief Justice states that it is not necessary for the court to go into the question of whether the cession of Porto Rico accomplished the naturalization of its people, or whether a citizen of Porto Rico, under the Act of Congress creating a civil government for that island, is necessarily a citizen of the United States. The question before the court is not one of citizenship,